

## **EXHIBIT 13**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF SAM ROECKER  
REGARDING WILLIAM B. ABRAMS  
MOTION TO DESIGNATE  
IMPROPERLY SOLICITED VOTES  
PURSUANT TO 11 U.S.C. §1125(B) AND  
1126(E) AND BANKRUPTCY RULE 2019**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Date: May 12, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: Docket No. 6799, 6964, 6963

**DECLARATION OF SAM ROECKER**

Sam Roecker declares the following pursuant to 28 U.S.C. § 1746:

1. I am the owner of PATH TO VICTORY, LLC, a company based in Madison, Wisconsin, principally focused on public affairs consulting. I worked on a contract basis as a representative of WATTS GUERRA in the California wildfires litigation, and work under its direction and control in the case.

2. I attended a number of WATTS GUERRA's in-person client town hall meetings between 2017 and 2019.

3. I have distributed all of WATTS GUERRA's social media and website content involving the present vote on PG&E's Amended Plan of Reorganization since the voting period began on March 31, 2020.

1           4.       Since Mid-March, 2020, the COVID-19 pandemic has prevented WATTS  
2 GUERRA from conducting in-person client town hall meetings like those I personally attended  
3 between 2017 and 2019.

4           5.       I informed WATTS GUERRA that my company had access to a communications  
5 technology that could utilize telephone numbers of the firm's California Fires client base, and  
6 invite them to a WATTS GUERRA telephonic town hall meeting.  
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8           6.       Since the COVID-19 pandemic began, I have facilitated WATTS GUERRA  
9 telephonic town hall meetings on the following dates:

- 10                   a.   March 21, 2020;
- 11                   b.   March 26, 2020;
- 12                   c.   March 31, 2020;
- 13                   d.   April 4, 2020;
- 14                   e.   April 11, 2020;
- 15                   f.   April 18, 2020;
- 16                   g.   April 25, 2020;
- 17                   h.   May 2, 2020.

18           7.       In addition, my company is contracted to facilitate future telephonic town hall  
19 meeting between WATTS GUERRA and its clients on May 9, 2020 and May 15, 2020.  
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21           8.       During the town halls, we received client questions in real-time and Mikal Watts  
22 addressed as many of those question as possible during the 2-3 hour town halls. Beginning on  
23 April 4<sup>th</sup>, the town halls were made available to the general public.  
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25           9.       My data shows the number of individuals participating in these telephonic town  
26 hall meetings is as follows:

- 27                   a.   March 21, 2020 - 4,434 individuals;
- 28

- b. March 26, 2020 – 3,429 individuals;
- c. March 31, 2020 – 3,984 individuals;
- d. April 4, 2020 – 3,396 individuals;
- e. April 11, 2020 – 2,969 individuals;
- f. April 18, 2020 – 4,803 individuals;
- g. April 25, 2020 – 3,840 individuals;
- h. May 2, 2020 – 3,636 individuals.

10. My data shows individuals listened to these telephonic town hall meetings for a combined total of 1,769,328 minutes.

11. In addition, I have put the following messages up on Social Media between the beginning of the voting period on March 31, 2020 and the present:

a. Exhibit “A” -

<https://www.facebook.com/FireSettlementFacts/videos/3840165666054177>

b. Exhibit “B” – <https://www.facebook.com/watch/?v=1090940217945277>

c. Exhibit “C” – <https://www.facebook.com/events/292963808365512/>

d. Exhibit “D” – <https://www.facebook.com/watch/?v=1146553372354419>

e. Exhibit “E” –

<https://www.facebook.com/watch/FireSettlementFacts/2527527954242682/>

f. Exhibit “F” –

<https://www.facebook.com/FireSettlementFacts/posts/126012752391893>

g. Exhibit “G” –

<https://www.facebook.com/FireSettlementFacts/videos/345697469724989/>

h. Exhibit “H” –

<https://www.facebook.com/FireSettlementFacts/videos/3039362122793871/>

- 1 i. Exhibit “I” –  
2 <https://www.facebook.com/FireSettlementFacts/videos/3620751497952086/>  
3  
4 j. Exhibit “J” –  
5 <https://www.facebook.com/FireSettlementFacts/posts/124789352514233>  
6  
7 k. Exhibit “K” –  
8 <https://www.facebook.com/FireSettlementFacts/posts/123625652630603>  
9  
10 l. Exhibit “L” –  
11 <https://www.facebook.com/FireSettlementFacts/posts/123613805965121>  
12  
13 m. Exhibit “M” –  
14 <https://www.facebook.com/FireSettlementFacts/posts/123143792678789>  
15  
16 n. Exhibit “N” –  
17 <https://www.facebook.com/FireSettlementFacts/posts/123052739354561>  
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19 o. Exhibit “O” –  
20 <https://www.facebook.com/FireSettlementFacts/posts/122037846122717>  
21  
22 p. Exhibit “P” –  
23 <https://www.facebook.com/FireSettlementFacts/posts/121392652853903>  
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25 q. Exhibit “Q” –  
26 <https://www.facebook.com/FireSettlementFacts/posts/121365456189956>  
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28 r. Exhibit “R” –  
<https://www.facebook.com/FireSettlementFacts/posts/121336462859522>  
s. Exhibit “S” –  
<https://www.facebook.com/FireSettlementFacts/videos/225763745366386/>  
t. Exhibit “T” –  
<https://www.facebook.com/FireSettlementFacts/videos/362104778026959/>

1 u. Exhibit “U” –

2 <https://www.facebook.com/FireSettlementFacts/videos/226530605082975/>

3 v. Exhibit “V” –

4 <https://www.facebook.com/FireSettlementFacts/posts/120238086302693>

5 w. Exhibit “W” –

6 <https://www.facebook.com/FireSettlementFacts/videos/1584757941674736/>

7 x. Exhibit “X” –

8 <https://www.facebook.com/FireSettlementFacts/videos/559459741628747/>

9 y. Exhibit “Y” –

10 <https://www.facebook.com/FireSettlementFacts/videos/293635134999642>

11 z. Exhibit “Z” –

12 <https://www.facebook.com/FireSettlementFacts/videos/231917751490048/>

13 aa. Exhibit “AA” –

14 <https://www.facebook.com/FireSettlementFacts/videos/285720872418842/>

15 bb. Exhibit “BB” –

16 <https://www.facebook.com/FireSettlementFacts/videos/347781859513080/>

17 cc. Exhibit “CC” –

18 <https://www.facebook.com/FireSettlementFacts/posts/116964916630010>

19 dd. Exhibit “DD” –

20 <https://www.facebook.com/FireSettlementFacts/videos/290642748589250/>

21 ee. Exhibit “EE” –

22 <https://www.facebook.com/FireSettlementFacts/posts/116274773365691>

23 ff. Exhibit “FF” –

24 <https://www.facebook.com/FireSettlementFacts/videos/287252648931094/>

1 gg. Exhibit “GG” –

2 <https://www.facebook.com/FireSettlementFacts/posts/115741280085707>

3 hh. Exhibit “HH” –

4 <https://www.facebook.com/FireSettlementFacts/posts/115639620095873>

5 ii. Exhibit “II” –

6 <https://www.facebook.com/FireSettlementFacts/videos/899905817127955/>

7 jj. Exhibit “JJ” –

8 <https://www.facebook.com/FireSettlementFacts/videos/643379496503005/>

9 kk. Exhibit “KK” –

10 <https://www.facebook.com/FireSettlementFacts/videos/509811769684860/>

11 ll. Exhibit “LL” –

12 <https://www.facebook.com/FireSettlementFacts/videos/547748582524070/>

13 mm. Exhibit “MM” –

14 <https://www.facebook.com/FireSettlementFacts/videos/309491213353139/>

15 nn. Exhibit “NN” –

16 <https://www.facebook.com/FireSettlementFacts/videos/218748109346309/>

17 oo. Exhibit “OO” –

18 <https://www.facebook.com/FireSettlementFacts/videos/542870823025105/>

19 pp. Exhibit “PP” –

20 <https://www.facebook.com/FireSettlementFacts/videos/223164165558991/>

21 qq. Exhibit “QQ” –

22 <https://www.facebook.com/FireSettlementFacts/videos/1517322555288384/>

23 rr. Exhibit “RR” –

24 <https://www.facebook.com/FireSettlementFacts/videos/2622661388011471/>

1 ss. Exhibit "SS" -

2 <https://www.facebook.com/FireSettlementFacts/posts/113011093692059/>

3 tt. Exhibit "TT" -

4 <https://www.facebook.com/FireSettlementFacts/posts/111931730466662>

5 uu. Exhibit "UU" -

6 <https://www.facebook.com/FireSettlementFacts/videos/148065079950363>

7 vv. Exhibit "VV" -

8 <https://www.facebook.com/FireSettlementFacts/posts/111523247174177>

9 ww. Exhibit "WW" -

10 <https://www.facebook.com/FireSettlementFacts/videos/872142576634997/>

11 xx. Exhibit "XX" -

12 <https://www.facebook.com/FireSettlementFacts/videos/522931518419515/>

13 yy. Exhibit "YY" -

14 <https://www.facebook.com/FireSettlementFacts/posts/110105210649314>

15 zz. Exhibit "ZZ" -

16 <https://www.facebook.com/FireSettlementFacts/videos/526912224851409/>

17 aaa. Exhibit "AAA" -

18 <https://www.facebook.com/FireSettlementFacts/posts/109983693994799>

19 bbb. Exhibit "BBB" -

20 <https://www.facebook.com/FireSettlementFacts/videos/236570717538684/>

21 ccc. Exhibit "CCC" -

22 <https://www.facebook.com/FireSettlementFacts/posts/109831357343366>

23 ddd. Exhibit "DDD"-

24 <https://www.facebook.com/FireSettlementFacts/posts/108994064093762>



1 eee. Exhibit “EEE” –

2 <https://www.facebook.com/FireSettlementFacts/videos/3015026028549275/>

3 fff. Exhibit “FFF” –

4 <https://www.facebook.com/FireSettlementFacts/posts/108707874122381>

5 ggg. Exhibit “GGG” –

6 <https://www.facebook.com/FireSettlementFacts/videos/260135725148972/>

7 hhh. Exhibit “HHH” –

8 <https://www.facebook.com/FireSettlementFacts/videos/151760606187369/>

9 iii. Exhibit “III” –

10 <https://www.facebook.com/FireSettlementFacts/posts/107713680888467>

11 jjj. Exhibit “JJJ” –

12 <https://www.facebook.com/FireSettlementFacts/posts/107254500934385>

13 kkk. Exhibit “KKK” –

14 <https://www.facebook.com/FireSettlementFacts/videos/574070636790093/>

15 ll. Exhibit “JJJ” –

16 <https://www.facebook.com/FireSettlementFacts/posts/104996771160158>

17 mmm. Exhibit “MMM” –

18 <https://www.facebook.com/FireSettlementFacts/videos/207175540559798/>

19 nnn. Exhibit “NNN” -

20 <https://www.facebook.com/FireSettlementFacts/posts/104623217864180>

21 ooo. Exhibit “OOO” -

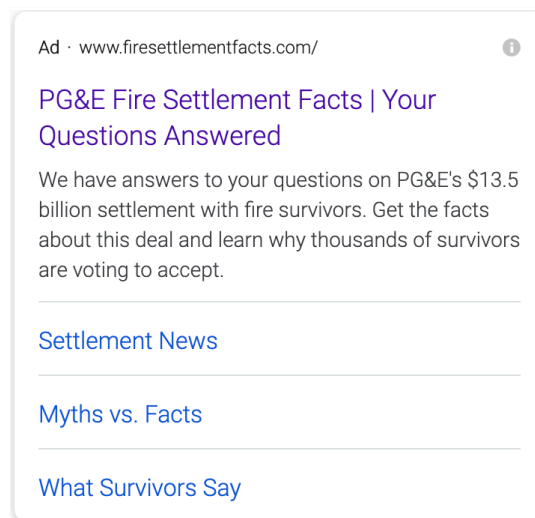
22 <https://www.facebook.com/FireSettlementFacts/posts/104031641256671>

23 12. In addition to social media posts, I have also placed digital advertising from the  
24 beginning of the voting period on March 31, 2020 and the present. Including the following:  
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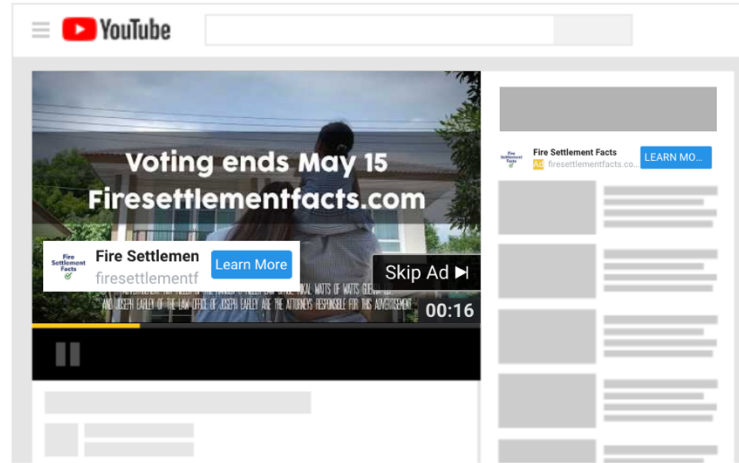
- 1 a. <https://www.facebook.com/102558958070606/posts/3840165666054177>  
2 b. [https://www.instagram.com/p/B\\_3IbN1j4Fo/#advertiser](https://www.instagram.com/p/B_3IbN1j4Fo/#advertiser)  
3 c. [https://www.instagram.com/p/B\\_3IWTwgGnO/#advertiser](https://www.instagram.com/p/B_3IWTwgGnO/#advertiser)  
4 d. <https://www.facebook.com/102558958070606/posts/1090940217945277>  
5 e. <https://www.facebook.com/102558958070606/posts/347781859513080>  
6 f. [https://www.facebook.com/102558958070606/posts/131782391814929?dco\\_ad\\_id=23844664646140189](https://www.facebook.com/102558958070606/posts/131782391814929?dco_ad_id=23844664646140189)  
7 g. Screenshot:



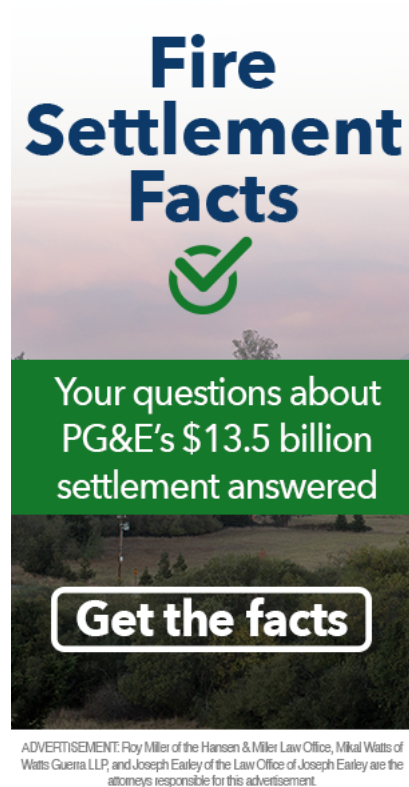
- 18 h. Screenshot:



i. Screenshot:



j. Screenshot:



k. Screenshot:



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1. Screenshot:



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m. Screenshot:



I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 7<sup>th</sup> day of May, 2020.

/s/ Sam Roecker  
Sam Roecker